

EXHIBIT 2

To: Lowell, Abbe David
Subject: RE: Update

From: Lee Wolosky <lwolosky@bsfllp.com>
Sent: Tuesday, August 28, 2018 5:03 PM
To: Lowell, Abbe David <ADLowell@winston.com>
Cc: Bloom, Eric W. <EBloom@winston.com>; Amy Neuhardt <aneuhardt@bsfllp.com>
Subject: RE: Update

I could not give you a list but I would imagine it would be a combination of electronic discovery and those individuals and organizations we believe have knowledge of allegations in the complaint.

From: Lowell, Abbe David [<mailto:ADLowell@winston.com>]
Sent: Tuesday, August 28, 2018 4:57 PM
To: Lee Wolosky
Cc: Bloom, Eric W.; Amy Neuhardt
Subject: RE: Update

And the second question I asked?

Abbe David Lowell

Partner

Winston & Strawn LLP
1700 K Street, N.W.
Washington, DC 20006-3817
D: +1 202-282-5875
F: +1 202-282-5100

200 Park Avenue
New York, NY 10166-4193
D: +1 212-294-3305
F: +1 212-294-4700

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From: Lee Wolosky <lwolosky@bsfllp.com>
Sent: Tuesday, August 28, 2018 3:50 PM
To: Lowell, Abbe David <ADLowell@winston.com>
Cc: Bloom, Eric W. <EBloom@winston.com>; Amy Neuhardt <aneuhardt@bsfllp.com>
Subject: RE: Update

No, we would not be willing to agree to that but we can agree not to serve him with discovery for a month after he answers the complaint (ie Oct 28). This assumes we have a rule 26(f) conference this week or next. As we discussed earlier, I would not expect that to take more than 15 minutes or so.

From: Lowell, Abbe David [<mailto:ADLowell@winston.com>]
Sent: Tuesday, August 28, 2018 3:41 PM
To: Lee Wolosky
Cc: Bloom, Eric W.; Amy Neuhardt
Subject: RE: Update

Lee and Amy –

I am arranging to talk to our client at the end of our day here. So that I am as clear with him as I can be, are we able to tell him his discovery will not occur until after the motions we file are decided by the SDNY and to what or which third parties are you wanting to begin discovery short of that?

Abbe

Abbe David Lowell

Partner

Winston & Strawn LLP
1700 K Street, N.W.
Washington, DC 20006-3817
D: +1 202-282-5875
F: +1 202-282-5100

200 Park Avenue
New York, NY 10166-4193
D: +1 212-294-3305
F: +1 212-294-4700

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